

PHILLIP A. SILVESTRI
Nevada Bar No. 11276
GREENSPOON MARDER LLP
3993 Howard Hughes Pkwy., Ste. 400
Las Vegas, Nevada 89169
Tel: (702) 978-4249
Fax: (954) 333-4256
Phillip.Silvestri@gmlaw.com

MYRNA L. MAYSONET
(Admitted Pro Hac Vice)
GREENSPOON MARDER LLP
201 East Pine St., Suite 500
Orlando, Florida 32801
Telephone: (407) 425-6559
Facsimile: (407) 422-6583
myrna.maysonet@gmlaw.com

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEN KACHUR,

Plaintiff,

vs.

NAV-LVH, LLC dba WESTGATE LAS
VEGAS RESORT & CASINO, a Nevada,
Limited Liability Company,

Defendant.

Case No.: 2:16-cv-02899

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISPOSITIVE
MOTIONS DEADLINE**

(SECOND REQUEST)

COME NOW, Defendant, named above, by and through its attorneys of record, MYRNA L. MAYSONET, ESQ. and PHILLIP A. SILVESTRI, ESQ., and Plaintiff, by and through his counsel of record, MICHAEL P. BALABAN, ESQ., pursuant to Local Rule IA 6-1, and herein stipulate, agree and make joint application to extend the dispositive motions date, for a period of four (4) days, up to and including December 14, 2018. The present dispositive motions deadline is December 10, 2018.

This is the second stipulation for an extension of time for the Defendant to file its Motion

1 for Summary Judgement. This stipulation is made and based upon the following factors:

2 Counsel for both Plaintiff and Defendant have several matters pending before this Court,
3 and have been engaged in ongoing discovery and briefing. Counsel is diligently working to
4 complete a joint pretrial memorandum in one of these matters concurrently with preparing
5 dispositive motions in this matter. While the parties have been working diligently, a short
6 continuance is necessary to allow the parties to complete their dispositive motions.

7 Based on the foregoing, the parties request that this Court order that the time for the
8 dispositive motions be extended four (4) days, up to and including, December 14, 2018.

9 Dated: December 6, 2018

Dated: December 6, 2018

10 LAW OFFICES OF MICHAEL P. BALABAN

GREENSPOON MARDER LLP

11 /s/Michael P. Balaban

/s/Phillip A. Silvestri

12 Michael P. Balaban, Esq.
13 10726 Del Rudini St.
14 Las Vegas, NV 89141
15 Tel: (702)586-2964
16 Fax: (702)586-3023
17 Attorney for Plaintiff

Myrna L. Maysonet, Esq.
Phillip A. Silvestri, Esq.
3993 Howard Hughes Parkway,
Suite 400
Las Vegas, NV 89169
Tel: (702) 978-4249
Fax: (954) 333-4256
phillip.silvestri@gmlaw.com
Attorneys for Defendant

18 IT IS SO ORDERED

19
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: December 7, 2018